

**ROBEIN, URANN,
SPENCER, PICARD & CANGEMI**

(A PROFESSIONAL LAW CORPORATION)

2540 SEVEN AVENUE, SUITE 400, METairie, LA 70009

P.O. BOX 6746, METairie, LA 70009-6746

TELEPHONE: (504) 885-9994

FACSIMILE: (504) 885-9969

www.rulaw.com



LOUIS L. ROBEIN, JR.
ROBERT M. URANN
JITIK RICHARD-SPENCER
NANCY PICARD
MARIA C. CANGEMI
CHRISTINA L. CARROLL*
KEVIN R. MASON**

OF COUNSEL
MARY MODENBACH WHITE

March 20, 2008

* ALSO ADMITTED IN MISSISSIPPI
** ALSO ADMITTED IN OREGON

Jeff S. Jordan
Federal Election Commission
Supervisory Attorney
Complaints Examination & Legal Administration
999 E Street, NW
Washington, DC 20463

RE: MUR #5970

Dear Mr. Jordan:

This letter is SEIU Local 100's response to MUR #5970 filed by Lori Sherwood against SEIU Local 100 and other entities. SEIU Local 100 is a labor union representing employees in Louisiana, Texas and Arkansas. In her complaint, Sherwood refers to SEIU Local 100 only in paragraphs 22 and 25.

In paragraph 22, she states:

1024 Elysian Fields is also the address for "SEIU Local 100", the Association of Community Organizations for Reform, Now ("ACORN") and The Elysian Fields Corporation. See *Exhibit 9*.

Wade Rathke, President of Elysian Fields Corporation is also the Chief Organizer for SEIU Local 100, founder of ACORN, and a member of the Board of Directors of Tides Center and Tides Foundation. See *Exhibit 10*. Tides received \$245,000 in grant money from Arca Foundation between 2002-2006. See Appendix I.

Paragraph 25 states:

In an attempt to gain an understanding about this group which uses a New Orleans address, I learned that in addition to "SEIU Local 100", "ACORN" and "Elysian Fields Corporation" (the latter 2 purport to be not for profit) that the Edwards campaign has links to another not for profit, Citizens Services, Inc. ("CSI"), a

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
2008 MAR 20 P 5:24

29044222846

Jeff S. Jordan
Federal Election Commission
March 20, 2008
Page 2

Louisiana corporation formed on January 7, 2005. Like the other entities, its address is reported to be at 1024 Elysian Fields, New Orleans, Louisiana. See Exhibit 12.

29044222847

The above statements so far as they refer to SEIU Local 100 are accurate. SEIU Local 100 has shared an address with the other organizations mentioned (although its address has recently changed). SEIU is a labor organization representing employees in Louisiana, Texas and Arkansas. It has no operations in Maryland. See Declaration of Fitzsimmons attached. Also Wade Rathke has served as an organizer for SEIU Local 100, and he also serves and/or has served as an officer and/or served as a board member of other organizations. Sherwood's complaint does not actually allege any improper conduct on the part of SEIU Local 100. However, to the extent that Sherwood implies any improper conduct on the part of SEIU Local 100 in the Donna Edwards campaign, that is denied. SEIU Local 100 has not made contributions to the Donna Edwards for Congress campaign, nor has it cooperated in concert with the Donna Edwards Campaign for Congress. To the extent that paragraph 25 of Sherwood's affidavit implies that SEIU 100 is somehow linked to the Donna Edwards Campaign, that is denied.

If you have further questions about SEIU Local 100 or need additional information, please contact me.

Sincerely yours,



Nancy Picard

NP/ugd

FEDERAL ELECTION COMMISSION

MUR #5970

DECLARATION OF ORELL FITZSIMMONS

I am making the following statements based on personal knowledge.

1. I hold the position of Field Director with Service Employees International Union (SEIU) Local 100, and have held this position since 1991. As Field Director, I supervise SEIU Local 100 staff in Louisiana, Texas, and Arkansas and approve all expenditures. Wade Rathke holds the position of Chief Organizer for SEIU Local 100.
2. SEIU Local 100 has offices in all three states, and its main New Orleans office was formerly located at 1024 Elysian Fields Avenue. That main New Orleans office has now moved to 2609 Canal Street.
3. SEIU Local 100 represents employees in the states of Texas, Louisiana, and Arkansas. It does not represent any employees in Maryland, and has no operations in Maryland.
4. SEIU Local 100 was not involved in the Deanna Edwards Campaign. It did not make any contributions to the Campaign and did not coordinate with the Campaign.

I declare under penalty of perjury that the foregoing declaration is true and correct.

Executed this 20 day of March, 2008.


Orell Fitzsimmons

29044222848